BOUNDARY REVIEW UNRESOLVED COVERAGE ENVIRONMENT CONTINUOUS MONITORING RECORD DECAY

Awarding agency oversight activity in the current assessment cycle observes that EDWOSB-designated contractors in Nevada whose continuous monitoring documentation has been examined present Active FCI Posture Record states in which the accuracy of the monitoring description and the accessibility of the monitoring output are both divergent from the present FCI environment under FAR 52.204-21. The record contains a monitoring description. The environment contains a different configuration. The two coexist. Each is observable and neither supersedes the other.

The continuous monitoring documentation within the Active FCI Posture Record describes what the organization monitors, how frequently, and across what scope. The monitoring environment as it currently operates reflects a different set of systems, a different scope, and a different configuration. The record carries one description. The environment carries another. The accuracy of the record is divergent. The accessibility of the monitoring output to review processes is divergent. Both conditions are present. Neither resolves the other. Similarly situated organizations in the same procurement environment present the same structural proximity between the monitoring documentation and the monitoring reality.

The record contains the current configuration or it contains an earlier one. For the continuous monitoring domain within this population, it contains an earlier one. The monitoring tools described in the record may have been replaced. The systems monitored may have changed. The frequency documented may not correspond to the frequency observed. The record's accuracy and the environment's state occupy the same assessment period. The record either corresponds to the organization's present FCI exposure or it does not. It does not. The monitoring documentation describes an earlier environment. Both states are visible within the same review cycle.

The structural proximity between the monitoring documentation gap and the record decay condition is the finding. The monitoring documentation is divergent. The record as a whole reflects that divergence. The two conditions coexist in the same record state. The organization's monitoring environment changed. The record did not follow the change. The record's description of the monitoring posture and the actual

monitoring posture sit beside each other in the same observable period. The two findings occupy the same assessment window. Neither is the cause of the other. Both are present.

The accessibility of the continuous monitoring output is a condition that exists alongside the accuracy condition. A record may describe a monitoring posture that is divergent from the current environment and simultaneously present monitoring output that is not accessible in structured form for review. The record is either synchronized with the current environment or it has fallen behind it. The monitoring output that would demonstrate correspondence between the record and the environment is not present in the form required by review processes. The output exists in a format that does not support structured review. The accessibility is divergent. The accuracy is divergent. The two findings coexist in the record as currently configured. Awarding agency oversight activity observes both. Neither condition displaces the other in the record.

Documentation either addresses the current state or it addresses a prior one. The continuous monitoring documentation within this EDWOSB population in Nevada addresses a prior state. The monitoring tools have changed. The monitoring scope has changed. The systems within the FCI boundary have changed. The documentation has not changed with them. The record carries a monitoring description whose accuracy does not correspond to the present environment and whose output is not accessible in the form that review processes require. A record whose boundary does not correspond to the present operating environment is the condition. The condition is structural. The monitoring documentation gap and the record's overall divergent state are both present at the same point. The two conditions are both present in the record at the same point.

The record that is in correspondence with the present environment presents continuous monitoring documentation in which the monitoring scope matches the current FCI boundary, the monitoring output is accessible in structured form, the accuracy of the description corresponds to the tools and systems currently in use across all 15 requirements and 6 domains, and the output supports review without requiring reconstruction. The EDWOSB contractor in Nevada whose monitoring documentation describes an earlier environment, whose output is not accessible in structured form, and whose record accuracy is divergent from the present operating state presents a record whose contents reflect an earlier point in the organization's FCI boundary history. The record is present. Its accuracy is not in correspondence. Its accessibility is not

in correspondence. Neither observation forecloses the other. The monitoring environment and the monitoring documentation occupy the same period. The correspondence between them is absent. The divergence between them persists.

The condition is observable. The record contains both the monitoring description and the gap between that description and the present environment. Neither condition has been resolved within the period the record covers. The coverage of the monitoring domain is unresolved. The environment continues to operate. The record continues to describe a prior configuration. The structural proximity between these two conditions is what the assessment observes. The record contains both at the same point in time. The condition is present. It does not resolve within the current review.